

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

In re Angela Gray

Debtor.

)  
) Case No. 12-49403-399  
) Chapter 13  
)  
) Response Due: April 13, 2015

To: JP MORGAN CHASE BANK NA PO BOX 901032 C/O CHASE AUTO FINANCE FT  
WORTH, TX 76101-2032

**OBJECTION TO CLAIM 3-1 OF JP MORGAN**

Debtor objects to your Claim No. 3-1 inasmuch as 97% of the NADA retail value of the vehicle which secures this debt, in its condition as of the filing of this cause, did not exceed \$4,000 and claimant's secured claim should be allowed in that amount only.

**PLEASE TAKE NOTICE: ANY RESPONSIVE PLEADING IN OPPOSITION TO THIS OBJECTION TO CLAIM MUST BE FILED IN WRITING NO LATER THAN TWENTY (20) DAYS AFTER THE DATE OF SERVICE OF THIS OBJECTION AS SHOWN ON THE CERTIFICATE OF SERVICE. (See L.B.R. 3007-1 B. and L.B.R. 9061-1 B.) THE RESPONSE MUST BE IMMEDIATELY SERVED UPON THE UNDERSIGNED. IF NO RESPONSE IS FILED, THE COURT MAY GRANT THIS OBJECTION WITHOUT FURTHER NOTICE ON EXPIRATION OF THE RESPONSE PERIOD.**

**IF A RESPONSE IS FILED, THE UNDERSIGNED OBJECTOR SHALL SET THE MATTER FOR HEARING AND PROVIDE NOTICE THEREOF PURSUANT TO L.B.R. 3007-1 B.**

*/s/Ross Briggs #2709 #31633*

Ross Briggs

Attorney At Law

4144 Lindell Ste 202

St Louis MO 63108

314-852-8293 Fax: 314-531-9958

[r-briggs@sbcglobal.net](mailto:r-briggs@sbcglobal.net)

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served electronically this 24<sup>th</sup> day of March, 2015 to Chapter 13 Trustee John V. LaBarge, Jr. and

JP MORGAN CHASE BANK NA  
PO BOX 901032  
C/O CHASE AUTO FINANCE FT WORTH, TX

/s/ Ross Briggs